

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

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THE STATE OF ARIZONA, et al.,	:	
	:	
Plaintiffs,	:	Civil Action No. 6:22-cv-01130
	:	
vs.	:	
	:	
MERRICK GARLAND, in his official capacity	:	
as Attorney General of the United States of	:	
America, et al.,	:	
	:	
Defendants,	:	
	:	
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**DECLARATION OF JULIE Yael WARD IN SUPPORT OF
THE NONPROFIT ORGANIZATIONS’ MOTION TO QUASH**

I, Julie Yael Ward, under penalty of perjury, declare as follows:

1. My name is Julie Yael Ward. I am over 18 years of age and have personal knowledge of the facts set forth in this Declaration. I am the co-director of Home is Here NOLA (“Home is Here”). I make this Declaration based upon my personal knowledge and in support of Home is Here and the other Nonprofit Organizations’ Motion to Quash the Subpoenas issued by the State of Louisiana in the above-captioned case.
2. I have been the Founder and subsequent Co-Director of Home is Here since it became operational in April 2021.
3. My career has been committed to providing support services for immigrants in Louisiana and elsewhere. To that end I have served in multiple capacities at other immigrants’ rights organizations and agencies, including a tenure as the Louisiana State Refugee Coordinator, most recently in 2014.
4. Home is Here has two full-time staff members, and one part-time member who began employment in February 2023. Despite its small size, I estimate that the organization

assists and connects hundreds of Louisianans annually—both immigrants and non-immigrants alike. Its core mission is to cultivate community-based systems of support where immigrants belong, contribute, lead, and have equitable access to the relationships, resources, and infrastructure they need to thrive.

5. To achieve this goal, Home is Here's essential function is to organize and connect immigrants with individual community members and local assistance groups, such as churches, synagogues, mutual-aid groups, and community support networks across Louisiana. Home is Here acts as a central node, constructing bridges across the state to connect immigrants who need help to those who can provide it. For these relationships to succeed, Home is Here relies on establishing partnerships and associations with individuals and community groups across Louisiana, all of whom operate under the Home is Here umbrella support network.

6. Home is Here has three core areas of focus: relationships of mutual aid for community resettlement; housing; and legal aid. In each of these three functions, Home is Here assists both newly arriving immigrants and those recently released from detention with partner organizations for mutual benefit. Its community resettlement program helps connect its community partner organizations that are willing to assist immigrants who need assistance adjusting to life in a new country and outside of a detention center. Its housing arm helps identify and connect landlords and housing programs that can provide safe and stable housing for recently released immigrants. The legal aid work helps match pro bono attorneys with immigrants who need ongoing legal representation.

7. Home is Here is more than a community-builder and matchmaker. It routinely provides training, mentorship, guidance and educational materials to associated partner organizations as well as newly arrived immigrants within the Home is Here network. Given the

relatively (1) limited civic engagement around immigrant justice issues in Louisiana, coupled with (2) the comparatively high number of immigrants within the state, and (3) a political landscape in Louisiana that has often been hostile to immigrants and the communities who support them makes advocacy a critical part of Home is Here's strategy. Part of this advocacy challenges and raises public awareness over policies that burden immigrant communities, especially in areas that have historically segregated immigrants from other Louisianans. Home is Here's advocacy, mentorship, guidance, and educational trainings are a vital element to bridge those gaps.

8. An essential element of the training Home is Here offers centers on the need for confidentiality when dealing with immigrant populations. The need to keep information confidential for these individuals is critical—they have often fled persecution, experienced violent abuse and detention, and are in a vulnerable state when we enter into relationship with them. We stress to our network partners the absolute, mandatory element of confidentiality when assisting noncitizens. Confidentiality is required part of all trainings, including educating partners on the scope of confidentiality, the ethical considerations, and the risks involved in dealing with a historically disadvantaged group engaging with the government that is often hostile to their needs. Maintaining confidentiality is an essential element of the Home is Here mission.

9. As an organization, Home is Here's work is centered on sustaining relationships, building new ones, and establishing trust across partner organizations in Louisiana. It is focused on qualitative information in order to do this work, for instance: who needs help and in what ways. It does not have consistent data collection practices or a comprehensive record keeping system. It does not conduct formal intakes, preserve biographical information such as dates of

birth or A-numbers, collect information about immigrants' families or inquire as to the nature of their legal claims. It does not ask about anyone's immigration status, period. It does however, collect narrative information regarding recently released immigrants' priorities and needs, such as housing, transportation, or health, which it shares with consent to organizations within the Home is Here network.

10. Even if Home is Here possessed ad hoc documents that were potentially responsive to the subpoena requests, the burden of searching, identifying, collecting, collating, and producing the information would be devastating. Home is Here does not have an advanced data collection or storage system that it has been using to collect data comprehensively. It does not even have an IT department. It incorporated less than six months ago and is an under-resourced non-profit with a full-time staff of two. The effort, cost, and time it would take to respond to the subpoena would be an existential threat to the organization's future; other operations would have to cease completely to comply with the subpoena's requests. The search alone—through tens of thousands of emails to identify who could potentially be or have been an asylum seeker, information about which that the organization does not inquire or collect data or documents on—would potentially take years to complete. Home is Here simply does not have the resources to successfully produce what the subpoena demands.

11. Beyond the immediate, practical effects subpoena compliance would cause, Home is Here would suffer devastating relational consequences. Were it forced to produce sensitive identifying information about the people it serves, its reputation as a trusted bridge and matchmaker would diminish significantly and immediately. The essential community-based trust that allows the organization to thrive would be eroded immediately, and partners would likely leave the Home is Here umbrella support network, which would collapse as a result.

12. Further, our ability to advocate for change to state, local, and federal immigration policy would be severely weakened without the support of our partners. The ripple effect would put our partners in fear of retribution, harassment, and abuse both from government actors and from private vigilantes. I base this off of personal experience from my tenure a few years ago at a Louisiana-based refugee agency that was also faced with releasing sensitive and identifying information. My colleagues and I experienced threats to our personal safety such that the organization had to hire private security for protection. Home is Here does not have sufficient funding to do the same; the retribution, harassment, and abuse would cause personal harm to staff as well as volunteers and cause the organization and its network to collapse entirely.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed at 1610 Oretha Castle Haley Blvd, Ste A New Orleans, LA 70113 on March 20, 2023.



JULIE Yael WARD